

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS

JURY TRIAL DEMANDED

**PLAINTIFF MAXELL, LTD.'S OPPOSITION TO DLA PIPER LLP (US)'S
MOTION TO STRIKE CERTAIN PORTIONS OF JAMIE B. BEABER'S
DECLARATION IN SUPPORT OF MAXELL'S MOTION TO DISQUALIFY**

Plaintiff Maxell, Ltd. ("Maxell") hereby opposes DLA Piper LLP (US)'s ("DLA Piper") Motion to Strike Certain Portions of Jamie B. Beaber's Declaration in Support of Maxell's Motion to Disqualify (D.I. 577). Maxell opposes the relief requested in the Motion to Strike because DLA Piper's objections to Mr. Beaber's declaration have no merit. Maxell disagrees that specific portions of Mr. Beaber's declaration identified in the Motion to Strike lack foundation, are not based on personal knowledge, and/or are hearsay.

Dated: November 11, 2020

By: /s/ Jamie B. Beaber

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 11th day of November, 2020, with a copy of this document via electronic mail pursuant to Local Rule CV-5(d).

/s/ Jamie B. Beaber
Jamie B. Beaber